

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

vs

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

DISTRICT COURT

No. 04-251 JJF

JURY TRIAL

PLAINTIFF'S FIRST SET OF INTERROGATORIES
DIRECTED TO THE DEFENDANT

TO: JOELLEN SHELDON, DEFENDANT

FROM: ASHLEY ADAMS, PLAINTIFF

Plaintiff, Ashley Adams, hereby propounds Interrogatories upon the Defendant, JoEllen Chapen Sheldon, to fully, under oath, and in accordance with the Delaware Rules of Civil Procedures, subject to the instructions below:

PLEASE TAKE NOTICE that Plaintiff demands answers to these Interrogatories, under oath, within thirty (30) days, pursuant to the Delaware Rules of Civil Procedure.

THESE INTERROGATORIES ARE DEEMED TO BE CONTINUING AND IF ANY INFORMATION RELATIVE TO THE SUBJECT MATTER INQUIRED INTO HEREIN SHOULD BE OBTAINED BY YOU OR YOUR COUNSEL, YOU ARE DIRECTED TO FURNISH SUCH ADDITIONAL FACTS TO THE UNDERSIGNED. OBJECTION WILL BE MADE AT THE TIME OF TRIAL TO ANY ATTEMPT TO INTRODUCE EVIDENCE WHICH IS DIRECTLY SOUGHT BY THESE INTERROGATORIES AND TO WHICH NO DISCLOSURE HAS BEEN MADE.

INSTRUCTIONS AND DEFINITIONS

A. In answering these Interrogatories, you are required to furnish all information that is available to you or subject to reasonable inquiry by you, including information in your possession or the possession of your attorneys, or other persons directly or indirectly connected with you or your attorneys and anyone else otherwise subject to your control.

B. Unless otherwise stated, these Interrogatories refer to the time, place, and the circumstances of the automobile accident and personal injuries mentioned or complained of in the Complaint.

C. Where name and identity of a person is required, please state full name, home address and also business address, if known.

D. Where knowledge or information in possession of a party is requested, such requests include knowledge of the party's agents, representatives and attorney's. The pronoun "you" refers to the party to whom the Interrogatories are addressed and the parties mentioned in (D)

F. "Identity" when referring to an individual, corporation, or other entity shall mean to set forth the name and telephone number, and if a corporation or other or other entity, its principle place of business, or if an individual, the present or last known home address, his or her job title or titles, by whom employed and address of the place of employment.

G. "Automobile Accident" is defined as the automobile accident that occurred on April 23, 2002 as referenced in the Plaintiff's complaint.

H. **ANSWER** may be appended to additional paper if necessary, typed or legibly handwritten.

INTERROGATORIES

Interrogatory No. 1.: Please state your full name, present address, date of birth, social security number, State in which your driver's license was issued, your driver's license number and if you have ever been known by any name other than the one that appears in the caption of this case, list all names by which you have been known, present employer's name and position of employment.

ANSWER:

Interrogatory No. 2.: State in particularity, your description of how the impact of your vehicle occurred with Plaintiff, Adams' vehicle giving a concise statement of facts as to how you contend the automobile accident took place, providing your detailed description of the occurrence.

ANSWER:

Interrogatory No. 3.: After impact with Plaintiff, Adams vehicle, did you report the automobile accident by calling 9.1.1.? if not, by whom where the police notified, listing the time of notification and by whom. If you claim you initiated the call, provide the same information as an answer to this interrogatory, verbatim or rephrased, the information given during the police call.

ANSWER:

Interrogatory No. 4.: State your conversation with Adams, if you claim you did have a conversation with Adams, after impacting Adams' car.

ANSWER:

Interrogatory No. 5.: State the itinerary of your vehicle for the four (4) hours prior to the automobile accident, including the time and place of the beginning of the trip, the time and duration of each stop, the place of destination, and the expected time of arrival.

ANSWER:

Interrogatory No. 6.: State whether you consumed any alcoholic beverages, medications, or drugs within twelve (12) hours prior to the accident, places where such alcoholic beverages, medications, or drugs were obtained, and the nature and amount thereof.

ANSWER:

Interrogatory No. 7.: State what part of your vehicle was damaged, and if it was repaired, stated the identity of the person who performed such repairs, the dates of such work, and the cost thereof.

ANSWER:

Interrogatory No. 8.: State in detail the nature of all bodily injuries sustained by you and as a result of the automobile accident, and provide treating physicians and institutions contact information. If you contend that you received no injuries, no treatment whatsoever, name any and all medical practitioners that you reported this automobile accident to, or had discussions concerning and the results of such reporting or examination, to result in what specific treatment, if any.

ANSWER:

Interrogatory No. 9.: Identify the cellular telephone number in your possession on the day of the incident, and produce the telephone records for April 23, 2002, in its entirety, stating whether you were involved in a cellular telephone conversation at the time of the impact, initiating a cellular call, or receiving a cellular call, listing the number of the cellular telephone, the cellular telephone company's name, the name that the cellular telephone number is listed under, whether that usage was with a cellular telephone listed in your name, a family member's name, or anyone else the cellular telephone would be listed under.

ANSWER:

Interrogatory No.10.: Please list all prior motor vehicle accidents in which you have been involved, either with other person or with property, whose fault of the accident, identifying all law suits to which you are or have ever been a party and include in your answer as to each law suit whether you were a plaintiff or defendant, the date, place, name of court, and case number of the law suit, the name of the other parties to the law suit, the nature of the law suit, the present status of the law suit and if the case has terminated or settled.

ANSWER:

Interrogatory No. 11.: Please state in detail all actions you took or attempted to take to avoid the collision with Plaintiff, Adams' vehicle.

ANSWER:

Interrogatory No. 12.: Please identify all expert witnesses who will be called at the trial of this case and summary of the expected testimony of each.

ANSWER:

Interrogatory No. 13.: As a result of the April 23, 2002 automobile accident, provide cost estimates of the damages to your vehicle, pictures of your damaged vehicle showing the damages, pictures of the vehicle after the vehicle was repaired, copy of the actual bill for repair, who repaired the vehicle, all cost estimates obtained on the vehicle for damages relating to the April 23, 2002 automobile accident.

ANSWER:

Interrogatory No. 14.: Please state whether you were under the care of a physician, in particularity, medical illnesses, psychological illnesses at the time of the automobile accident, if so, please state the name and addresses of your physician(s), specify the illness or condition for which you were treated, and list any prescribed medication, stating all medical illnesses, psychological, mental illness for diagnosis or treatment of, listing these in chronological order with most recent recording first, repeating all medical and mental illness and treatments.

ANSWER:

Interrogatory No.15.: Please list all violation of the motor vehicle laws of the State of Maryland or any other jurisdiction with which you have been charged since you obtained your driver's license.

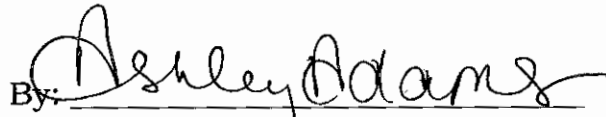
ANSWER:

Interrogatory No. 16.: State if any repairs were made the 1998 Volvo vehicle you were operating and the maintenance record for one (1) prior to April 23, 2002 automobile accident, providing a detailed maintenance/repair record of the 1998 Volvo you were driving on April 23, 2002.

ANSWER:

Interrogatory No. 17.: Identify each person who participated in the preparation of the Answers to these Interrogatories, and, for each person so identified, state the nature of his or her personal involvement and participation regarding the Answer to each Interrogatory that he or she participated in answering.

ANSWER:

By: 
ASHLEY ADAMS
P.O. Box 7652
Newark, DE 19714
(302) - 393 - 3525

Filed: July 17, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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716 N Barrett Lane
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PLAINTIFF

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DISTRICT COURT

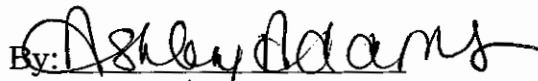
No. 04-251 JJF

TO: The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N King Street
Lock Box 44
Wilmington, DE 19801

NOTICE OF SERVICE

I hereby give notice that I caused notification by first-class mail and /or hand-delivered for **Plaintiff's First Set of Interrogatories to the Defendant** to be served upon the following on the date set forth below:

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: 
Ashley Adams, Plaintiff, *pro se*
PO Box 7652
Newark, DE 19714

FILING DATE: July 17, 2007